

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
PAMMIE LYNN KRUPAR,

**DEBTOR(S).**

PAMMIE LYNN KRUPAR,

**MOVANT(S),**

v.

21<sup>st</sup> MORTGAGE CORPORATION,  
**RESPONDENT,**

and

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE,  
**ADDITIONAL RESPONDENT.**

Bankruptcy No. 19-23389-JAD

Chapter 13

Document No.

Related to Claim No. 4

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE PURSUANT  
TO W.PA.LBR 3002-4 (b)(2)**

AND NOW, comes the debtor, Pammie Lynn Krupar, by and through her attorney, Daniel J. Boger, Esq. and the law firm of Harold Shepley & Associates, LLC, and respectfully files the within Declaration Regarding Notice of Mortgage Payment Change and, in support thereof, represent as follows:

1. The debtor is Pammie Lynn Krupar, an adult individual presently residing at 357 Valley Street, McDonald, Pennsylvania 15057.
2. Counsel for the debtors is Daniel J. Boger, Esq., of Harold Shepley & Associates LLC, 209 West Patriot Street, Somerset, Pennsylvania 15501.
3. The mortgage company for the debtors' residential real estate is 21<sup>st</sup> Mortgage Corporation, P.O. Box 477, Knoxville, TN 37901, as indicated on the proof of claim and filed at Claim No. 4 in the Claims Register in this case.

4. The new post-petition monthly payment payable to 21<sup>st</sup> Mortgage Corporation is \$837.98 effective August 1, 2021, as indicated in the Notice of Mortgage Payment Change filed on July 8, 2021, at Claim No. 4 in the Claims Register in this case.
5. The new post-petition monthly payment payable to 21<sup>st</sup> Mortgage Corporation is \$945.47 effective August 1, 2022, as indicated in the Notice of Mortgage Payment Change filed on July 7, 2022, at Claim No. 4 in the Claims Register in this case.
6. The new post-petition monthly payment payable to 21<sup>st</sup> Mortgage Corporation is \$1,115.95 effective August 1, 2023, as indicated in the Notice of Mortgage Payment Change filed on July 10, 2023, at Claim No. 4 in the Claims Register in this case.
7. The new post-petition monthly payment payable to 21<sup>st</sup> Mortgage Corporation is \$1,236.16 effective August 1, 2024, as indicated in the Notice of Mortgage Payment Change filed on July 8, 2024, at Claim No. 4 in the Claims Register in this case.
8. Debtor's counsel has reviewed the current Plan dated August 3, 2020, that was confirmed as evidenced by the Order issued on September 17, 2020 at docket number 52, recomputed the Plan payment based upon the mortgage payment change and believes that the existing Chapter 13 Plan payment is sufficient to fund the Plan.

Date: 07/18/2024

Respectfully submitted,  
/s/ Daniel J. Boger, Esq.  
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